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**From:** Jacobson, David [Jacobson.David@epa.gov]  
**Sent:** 5/6/2019 9:45:12 PM  
**To:** Dunn, John [Dunn.John@epa.gov]; Ramach, Sean [Ramach.Sean@epa.gov]; Clark, Jackie [Clark.Jackie@epa.gov]  
**CC:** Curtis, Glenn [curtis.glenn@epa.gov]  
**Subject:** RE: ICIC Based Limits for the Labadie Facility

Backing up a bit, I think we may have gone on the wrong track because the original request was possibly flawed:

"A determination on if we can use the unit code 5J (Number) as an acceptable unit for ICIS Parameter Code 51414 (Thermal Discharge) has not been determined. We are requesting the use of this unit code with the Parameter Code 51414 as we have many calculated values for Thermal Discharge. Please see the string below for additional information."

It's not that it's difficult to add new unit codes such that it can be used for an existing parameter. The problem is that the unit code requested was not consistent with what the parameter was. A parameter code is more reflective of a way of measuring a given pollutant. If it's a novel way of measurement that cannot be converted to an existing unit then it probably should get a new parameter code. So really the change requested was not appropriate. Instead it likely merited, and is very readily done, a new parameter code, which would be fine.

What I am a bit confused about and could require clarification is why the state believed that a new unit code should be added to an existing parameter. Is it because that specific parameter was identified in a permit or enforcement action? This is where I think things got rather confusing. I realize it is common practice for parameter codes to be hard coded into permits, but it must be appreciated that the same criteria for everyone applies for the parameter codes and there is no such thing as changing a parameter code so that it only applies to one permit. If there really is a novel use case then it should get a new parameter that is self encapsulated.

David

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**From:** Dunn, John  
**Sent:** Friday, May 3, 2019 11:03 AM  
**To:** Ramach, Sean <Ramach.Sean@epa.gov>; Clark, Jackie <Clark.Jackie@epa.gov>; Jacobson, David <Jacobson.David@epa.gov>  
**Cc:** Curtis, Glenn <curtis.glenn@epa.gov>  
**Subject:** FW: ICIC Based Limits for the Labadie Facility

I think I ironed out an approach that does not require an ICIS addition. It also makes data more understandable and transparent to the public.

This will require a public notice, so it isn't a done deal, but this will fly. --JD

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**From:** Dunn, John  
**Sent:** Friday, May 03, 2019 9:59 AM  
**To:** Abbott, Michael <michael.abbott@dnr.mo.gov>; Hackler, Pam <pam.hackler@dnr.mo.gov>; Meyers, Leasue <leasue.meyers@dnr.mo.gov>; Cripe, Rebecca <Rebecca.Cripe@dnr.mo.gov>  
**Cc:** Curtis, Glenn <curtis.glenn@epa.gov>  
**Subject:** ICIC Based Limits for the Labadie Facility

Mike, et al.

The Ameren-Labadie facility was modified with limits based on modeling, using an output of that modeling. The output parameter didn't fit into the ICIS electronic reporting framework and you requested a new ICIS parameter. This requires

a pretty huge effort at the HQ end, so I did the work to convert the modeling output limit into a standardized temperature limit (degrees F) that will fit in the ICIS format. Attached is the proposed procedure for conversion. I've shown how the converted limits can be expressed in the permit, and the applicable ICIS code. A second attachment shows heat related codes, and highlights the ones I picked.

Feel free to ask for explanation or assistance.

--JD